

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN COUNCIL OF THE BLIND OF
METROPOLITAN CHICAGO, ANN BRASH,
MAUREEN HENEGHAN, and RAY
CAMPBELL, on behalf of themselves and all
others similarly situated,

Plaintiffs,

-against-

CITY OF CHICAGO,

Defendant.

Case No. 1:19-cv-06322

Honorable LaShonda A. Hunt

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

-against-

CITY OF CHICAGO,

Defendant.

PLAINTIFFS' MOTION FOR ENTRY OF REMEDIAL ORDER

Plaintiffs American Council of the Blind of Metropolitan Chicago, Ann Brash, Ray Campbell and Maureen Heneghan, by their attorneys, move this Court to enter a remedial order following the Court's entry of summary judgment holding the Defendant City of Chicago in violation of Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973. As explained in Plaintiffs' memorandum of law and the Declaration of Linda Myers, the accompanying proposed remedial plan outlines the key terms of the injunctive relief necessary to provide individuals who are blind and low vision equal access to the safety information conveyed by visual pedestrian signals.

Dated: November 6, 2023

Respectfully submitted,

/s/ Nigel F. Telman
NIGEL F. TELMAN
Edward C. Young
Dakota D. Treece
PROSKAUER ROSE LLP
70 West Madison
Suite 3800
Chicago, Illinois 60602
Phone: (312) 962-3550
Fax: (312) 962-3551
ntelman@proskauer.com
eyoung@proskauer.com
dtreece@proskauer.com

MADELEINE J. REICHMAN*
Torie Atkinson*
DISABILITY RIGHTS ADVOCATES
655 Third Ave., 14th Floor
New York, NY 10017
Phone: (212) 644-8644
Fax: (212) 644-8636
mreichman@dralegal.org
tatkinson@dralegal.org

Rachel Weisberg
DISABILITY RIGHTS ADVOCATES
300 South Wacker Dr., 32nd Floor
Chicago, IL 60606
Phone: (332) 217-2363
rweisberg@dralegal.org

Attorneys for Plaintiffs

*Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I, Nigel F. Telman, one of the attorneys for Plaintiffs, hereby certify that on November 6, 2023, I caused a copy of the foregoing to be served electronically upon all the counsel of record listed below via the Court's ECF System:

John L. Hendricks
Managing Deputy Corporation Counsel
Litigation
Andrew Worseck
Deputy Corporation Counsel
City of Chicago Law Department
121 North LaSalle Street, Suite 600
Chicago, IL 60602
Phone: (312) 744-6975 / 744-7220
E-mail: John.Hendricks@cityofchicago.org
Andrew.Worseck@cityofchicago.org

John C. Hansberry
Matthew Scot Payne
Laura Caplin
Nathan Marketich
FOX ROTHSCCHILD LLP
321 N. Clark Street, Suite 1600
Chicago, Illinois 60654
Phone (312) 517-9200
E-mail: jhansberry@foxrothschild.com
mpayne@foxrothschild.com
lcaplin@foxrothschild.com
nmarketich@foxrothschild.com

Attorneys for Defendant

Patrick Johnson
Sarah J. North
Assistant United States Attorneys
219 South Dearborn Street, 9th Floor
Chicago, Illinois 60604
Phone: (312) 353-5327
E-mail: patrick.johnson2@usdoj.gov
sarah.north@usdoj.gov

Matthew Faiella
Jane Andersen
U.S. Department of Justice
Civil Rights Division –
Disability Rights Section
950 Pennsylvania Avenue, N.W. – 4CON 9.123
Washington, D.C. 20530
Phone: (202) 598-3193
E-mail: matthew.faiella@usdoj.gov
jane.andersen2@usdoj.gov

Attorneys for Plaintiff-Intervenor United States